



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

J. Kevin Shaffer
Assistant Corporation Counsel
phone: (212) 356-1105
fax: (212) 356-2089
email: jshaffer@law.nyc.gov

February 21, 2020

VIA ECF

Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 15D
New York, New York 10007

Re: Erin Jones v. The City of New York
17 Civ. 4894 (AT) (KHP)

Dear Judge Torres:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, recently assigned as trial counsel to represent Defendant City of New York in the above-referenced action. I write on behalf of Defendant to request an extension of Defendant's time to file its pre-trial submissions, specifically, the pretrial statement, request to charge, verdict form, *voir dire*, and any motions *in limine* from February 25, 2020¹ until March 17, 2020. This is Defendant's first request for an extension of time for these submissions. This request for an extension will not affect any other scheduled dates or deadlines in this case. Plaintiff consents to this request.

Defendants make this request for an extension because the previously assigned Assistant Corporation Counsel has left the New York City Law Department, and trial counsel have just been assigned. Additionally, the undersigned will be out of the office, and out of state, from February 22, 2020 until February 28, 2020. Accordingly, Defendant respectfully requests an extension of its time to submit its pretrial statement, request to charge, verdict form, *voir dire*, and any motions *in limine*, from February 25, 2020 until March 17, 2020.

¹ Plaintiff served her pretrial statement on February 11, 2020. Thus, according to the Court's individual rules for pro se civil cases, Defendant's pretrial statement is currently due on February 25, 2020.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ J. Kevin Shaffer

J. Kevin Shaffer

Assistant Corporation Counsel

Cc: Erin Jones (by mail)
Plaintiff pro se

GRANTED. By **March 17, 2020**, Defendant shall submit its pre-trial submissions.

SO ORDERED.

Dated: February 21, 2020
New York, New York



ANALISA TORRES
United States District Judge